

In the U.S. District Court
for the Middle District of Tennessee
Nashville, Tennessee

Plaintiff
JAMES LAMBERT

Hon Judge:
Case No:
01-21 0053

V:

Defendant

Jury Demand.

Core Civic/Commissioner Tony Parker
DR ODELLA M.D. - ELIANA RODELA M.D.
Core Civic/South Central C/F
Nurse Practitioner Mary Dean NP

Complaint for Violation of Civil Rights
Under 42 U.S.C. 1983

① Previous Law Suits:

A. Have you begun other Lawsuits in State or Federal Court
dealing with this issue and facts.

☐ yes ☒ NO

② Parties to Law suit:

Name and Address's

JAMES LAMBERT - Plaintiff
SCCF
555 Forrest Ave P.O. Box 279
Clifton, TN 38425

Core Civic/South Central Correctional Facility - Defendant
555 Forrest Ave P.O. Box 279
Clifton, TN 38425
Attn Warden Perry.

James Lambert U.S.C. 1983 Civil Right Law Suit
— Continuation —

List All Parties to Law Suit:

DR RODENA M.D. - Defendant - DR. ELIANA Rodena - work
South Central Correctional Facility / CoreCivic Inc.
555 Forrest Ave P.O. Box 279
Clifton, TN 38425

Nurse Practitioner Mary Dean NP - Defendant - work
South Central Correctional Facility / CoreCivic Inc.
555 Forrest Ave P.O. Box 279
Clifton, TN 38425

Statement of Claims - Continued -

Mr Lambert has seen both Nurse Practitioners, Nurses Ms Rich RN, RN Ms Mosley and Dr Dean and has found out his condition is in a extreme levels that require chemo-therapy and pain medications that cannot and will not be given here at Corecivic. He has also seen DR ELIANA ORTEGA M.D.

Mr Lambert has requested numerous times to be moved to special needs to be able to get the care he needs to save his life. His health gets worse every day, the medical staff, doctors, nurses and nurse practitioners deny Mr Lambert his life saving medical care, medication and procedures he needs to continue to live. Mr Lambert was not sentenced to life in prison and should not be forced to die at the hands of inept doctors and a broken system. He is treated as a bother and nuisance rather than a human being. He as well as everyone deserve to get the proper medical care rather than incarcerated or not. He has now stage 3-4 liver cancer.

Relief: state what you want the courts to do for you.:

Mr. Lambert would ask this Honorable Court, Honorable Judge and Honorable Jury to place him at Deberry Special Needs Facility to be housed where he can get the proper care, medications and procedures needed to save his life, he is entitled to chemo-therapy and proper pain medications. Mr Lambert would show under the case of Scott MacArthur v. Derrick Schofield, TN Dept of Corrections in 2014 in front of Honorable Chief Judge William Haynes Jr. he ruled that the commissioner does oversee all daily operations of the TDOC and that includes the medical departments of state and private prisons.

Judge William Haynes Jr. also gave authority to Judges to place prisoners in need of medical care to a prison where a inmate would receive it. Mr Lambert is asking for the amount of \$ 900,000 or Nine Hundred thousand dollars, he is asking for the Defendants to pay Attorney fees, court cost, Postage and any other cost Filing fees deem OK by this court. He is asking to be placed at Deberry Special Needs in Nashville, TN until the remainder of his sentence is complete and his medical care is taken care of.

② Continued:

Tony Parker - Commissioner TN Dept of Corrections - Defendant
6th Floor Rachel Jackson Bldg.
320 6th Ave North
Nashville, TN 37243-0465

- See continuation - sheet

III Place of Confinement:

Ⓐ South Central Correctional Facility / Corecivic

Ⓑ Is there a Grievance Procedure:
C: Yes

Ⓒ Did you file a Grievance? What was the outcome? :

C: Yes filed one Form CR 1394

outcome came back Policy states "you may not Grieve.
A medical procedure or diagnosis". No Appeal process.

IV Statement of Claim:

state the facts of your claim, people, places, dates and events. Give no legal arguments or cases.

Ⓐ. In January of 2017 Mr Lambert was moved from West TN. High C/F to Trousdale Corecivic in Nashville, TN. At this time Mr Lambert was suffering from Liver Cancer and serosis of the liver along with other medical issues and was considered a chronic Care Patient. At Trousdale Corecivic he was taken care of in a medical system that gave him some relief for his ailments until he could be placed at Deberry special needs or provided the care he was going to need by outside medical facilities and Doctors.

In 2018 Mr. Lambert was moved from Corecivic in Trousdale Nashville to South Central Correctional Facility / Corecivic in Clifton, TN. After arriving at South Central

Respectfully Submitted
This day 28 of August, 2021

sign * James Lambert 134319
print JAMES LAMBERT # 134319
SCCF

555 Forrest Ave P.O. Box 279
Clifton TN 38425

Certificate of Service

I swear A true and Full copy of the foregoing USC 1983
Civil Rights Law suit was sent First class U.S. mail to the
Following Defendants:

Core Civic/South Central Correctional Facility

555 Forrest Ave P.O. Box 279

Clifton TN 38425

Attn: Warden Penny.

TN Dept of Corrections Commissioner's Office

Tony Parker commissioner

6th Floor Rachel Jackson Bldg.

320 6th Ave North

Nashville, TN 37243-0465

DR ODELLA M.D. - ELANIA ODELLA M.D./Nurse Practitioner

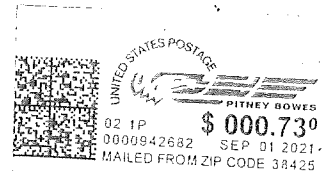
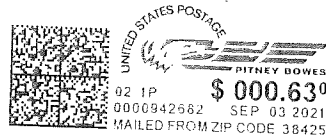
DEAN N.P.

South Central Correctional Facility

555 Forrest Ave P.O. Box 279

Clifton, TN 38425

JAMES LAMBERT # 134310
SCCF
555 Forrest Ave PO Box 279
clifton, TN 38425



U.S. District Court, Middle District of Tennessee
Nashville clerk's office
801 Broadway, Room 800
Nashville, TN 37203

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Not Responsible For The Contents